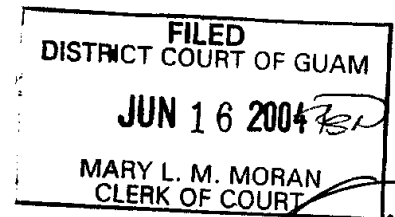


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Attorneys for Defendant The Hongkong and Shanghai Banking Corporation Ltd

IN THE DISTRICT COURT OF GUAM

| | | |
|-----------------------------|---|------------------------------------|
| ALAN SADHWANI, LAJU |) | CIVIL CASE NO. 03-00036 |
| SADHWANI, and K. SADHWANI'S |) | |
| INC., a Guam corporation, |) | |
| |) | |
| Plaintiffs, |) | MOTION TO STRIKE COUNT |
| |) | SIX OF THE SECOND |
| v. |) | AMENDED COMPLAINT OR, |
| |) | IN THE ALTERNATIVE, |
| HONGKONG AND SHANGHAI |) | MOTION TO DISMISS THIRD |
| BANKING CORPORATION, LTD., |) | AND SIXTH CAUSES OF |
| et al., |) | ACTION [FRCP 12(b)(6), (f)] |
| Defendants. |) | AND FOR SANCTIONS |
| |) | [FRCP 11(b)] |

TO: PLAINTIFFS, and their attorneys, Arriola Cowan & Arriola

You are hereby advised that as soon as the matter can be heard at the District Court of Guam, 520 W. Soledad Avenue, 4th Floor, Hagåtña, Guam 96910, Defendant The Hongkong and Shanghai Banking Corporation Limited ("HSBC") will move the Court for an Order striking the Count Six of the Second Amended Complaint filed herein on June 2, 2004, or, in the alternative, dismissing the Third and Sixth Causes of Action in the Second Amended Complaint and for sanctions, pursuant to Rules 11(b), 12(f) 12(b)(6), and 15 of the Federal Rules of Civil Procedure, as more fully explained in

Sadhwani, et al. v. Hongkong and Shanghai Banking Corporation Ltd., et al.

Civil Case No. 03-00036

Motion to Strike Count Six of the Second Amended Complaint or, in the Alternative, Motion to Dismiss Third and Sixth Causes of Action and for Sanctions

Page 2 of 2 pages

the Memorandum of Points and Authorities contemporaneously filed herein.

The motion will be based upon this Motion, the Memorandum of Points and Authorities filed herein, the papers, records, and files in this action, and upon such oral and documentary evidence as may be presented at the hearing of the Motion.

Dated this 15th day of June, 2004.

LAW OFFICES OF BRONZE & TANG, P.C.
Attorneys for Defendant The Hongkong and
Shanghai Banking Corporation Ltd.

By:



JACQUES G. BRONZE